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September 30, 2024

VIA ECF

Honorable Michael A. Hammer, U.S.M.J.
United States District Court, District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *Teva Branded Pharmaceutical Products R&D, Inc., et al. v. Cipla USA, Inc., et al.*, Civil Action No: 2:24-cv-00909 (SRC-MAH) (Consolidated)

***Teva Branded Pharmaceutical Products R&D, Inc., et al. v. Cipla USA, Inc., et al.*, Civil Action No: 2:24-cv-05856 (SRC-MAH)**

***Teva Branded Pharmaceutical Products R&D, Inc., et al. v. Cipla USA, Inc., et al.*, Civil Action No: 2:24-cv-07162 (SRC-MAH)**

Dear Judge Hammer:

This firm, together with Williams & Connolly LLP, represents Plaintiffs Teva Branded Pharmaceutical Products R&D, Inc. and Norton (Waterford) Ltd. (collectively, "Teva") in the above-captioned consolidated matters.

Enclosed for the Court's consideration, please find the Electronically Stored Information Protocol ("ESI Protocol"), which has been agreed to by the parties. Should the ESI Protocol be acceptable to Your Honor, we respectfully request it be entered on the docket. We thank the Court for its attention to these matters and are available should the Court have any questions.

Respectfully submitted,

s/ Liza M. Walsh

Liza M. Walsh

Encl.
cc: All counsel of record (via ECF and Email)